

**U.S. Department of Justice**
Civil Division

July 25, 2025**By ECF**

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Courthouse
Federal Square
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**
Government's Response to ECF 365

Dear Judge Farbiarz:

Respondents ("the Government") respectfully submit this letter in response to the Court's Order, ECF 365, regarding whether the Government will file a request for an extension of time to file a supplemental reply in support of its motion to stay pending appeal the Court's July 17 order, ECF 360, 363. The Government has written and filed its reply in support of its stay motion and believes its submission has adequately presented and preserved the issues. Therefore, the Government does not intend to request additional time to submit further briefing in support of its motion to stay pending appeal. The Government respectfully requests a prompt ruling from this Court, so that it may seek relief on appeal, if necessary.

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

YAAKOV M. ROTH
Principal Deputy Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General

DHRUMAN Y. SAMPAT
Senior Litigation Counsel

/s/ Alanna T. Duong
ALANNA T. DUONG
Senior Litigation Counsel
Office of Immigration Litigation
Civil Division, U.S Dept. of Justice
PO Box 878, Ben Franklin Station
Washington, D.C. 20044
alanna.duong@usdoj.gov